

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

KATIE E. GLENN,
on behalf of herself and all
others similarly situated,

Case No. 21-cv-313

Plaintiff,

v.

PRESBYTERIAN HOMES AND SERVICES,

Defendant.

STIPULATED MOTION FOR TEMPORARY STAY

Plaintiff Katie Glenn (“Plaintiff”), by her attorneys, Walcheske & Luzi, LLC, and Defendant Presbyterian Homes and Services (“PHS”), by its attorneys Davis & Kuelthau, s.c., stipulate and accordingly move the Court as follows:

1. On March 15, 2021, the Court issued an order noting that, prior to the transfer of the above captioned matter to this district, Magistrate Judge Crocker in the Western District of Wisconsin issued a Preliminary Pretrial Conference Order (the “Scheduling Order”).
2. The Court’s order on March 15, 2021, further required the parties to adhere to the schedule set forth in the Scheduling Order.
3. Since this time, the parties, through counsel, have commenced discussions as to the possibility of resolving this matter via settlement.
4. To determine what, if any, liability may exist under the Fair Labor Standards Act (“FLSA”), PHS has worked with its Human Resources Information System (“HRIS”) vendor and, concurrently, has retained a third-party HRIS consultant to assist in configuring, testing and

running a version of the HRIS program's payroll module for the period of time PHS has used this software. As PHS has employed thousands of hourly employees since that time, this process is complex and requires the time-consuming and expensive efforts of several PHS employees in coordination with the HRIS vendor and consultant.

5. PHS's counsel has represented to Plaintiff's counsel that if, through this process, PHS identifies any employees who were underpaid in violation of the FLSA, PHS will pay amounts owed to those employees, along with any additional amounts required by the FLSA.

6. Due to the scope of this project, the parties anticipate that the process to analyze liability, discuss settlement and, assuming such discussions are productive, reach an agreement will take several months.

7. In order to permit these efforts to proceed and for PHS to devote the necessary resources to this undertaking, while minimizing legal fees and costs to both parties and the impact on the Court's docket, the parties have agreed to jointly request the Court to stay this action.

8. To this end, the parties jointly desire for this Court to stay this action for a period of six (6) months, or through October 31, 2021.

9. If the requested stay is granted, then the parties will apprise the Court, no later than October 31, 2021, of the status of their continuing efforts to resolve this matter.

WHEREFORE, the parties jointly move the Court to stay this action, in its entirety, through October 31, 2021.

DAVIS & KUELTHAU, s.c.

Dated this 29th day of April, 2021.

s/ Anthony J. Steffek
Anthony J. Steffek
State Bar No. 1053615
Laurie E. Meyer
State Bar No. 1025405
Attorneys for Defendant, Presbyterian Homes
and Services

WALCHESKE & LUZI, LLC

Dated this 29th day of April, 2021.

s/ James A. Walcheske
James A. Walcheske
State Bar No. 1065635
Attorneys for Plaintiff, Katie E. Glenn